

Jackson Lewis P.C.
58 South Service Road, Suite 250
Melville NY 11747
(631) 247-0404 Main
(631) 247-0417 Fax
jacksonlewis.com

MEMO ENDORSED


MY DIRECT DIAL IS: 631-247-4670
MY EMAIL ADDRESS IS: DIANE.KREBS@JACKSONLEWIS.COM

April 18, 2023

VIA ECF

The Honorable Edgardo Ramos
U.S. District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

The Defendants' request for an extension of time, until
may 18, 2023, to file the parties' Joint Pre-Trial
Statement is granted. SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: April 19, 2023
New York, New York

Re: *Mehmet Emin Tatas v. Ali Baba's Terrace, Ali Riza Dogan,
Senol Bakir and Tolgahan Subakan*
Case No.: 1:19-cv-10595-ER

Dear Judge Ramos:

As counsel for Defendants, we are writing pursuant to Rule 1(E) of Your Honor's Individual Rules, to respectfully request an extension of time for the parties to file their Joint Pre-Trial Statement ("Statement"), from April 20, 2023 to May 18, 2023. Plaintiff's pro bono counsel has consented to this request. This is Defendants' second request for an extension. *Pro se* Plaintiff's first request for extension was granted on January 24, 2023, Defendants' first request for extension was granted on February 21, 2023 and Plaintiff's pro bono counsel's request for extension was granted on March 6, 2023.

The parties have been working diligently and cooperatively to prepare their joint Statement and have engaged in many discussions in order to draft a meaningful response. These discussions have taken significant time but have been beneficial to preparation of the joint Statement. The parties believe this additional time will result in a smoother and more streamlined trial.

We appreciate the Court's consideration of this matter. Should the Court desire any additional information, please let us know.

Respectfully submitted,

JACKSON LEWIS P.C.

Diane Krebs

Diane Krebs